



August 29, 2019

VIA ECF

Honorable Richard F. Boulware, II
Lloyd D. George Federal Courthouse
333 Las Vegas Blvd. South
Las Vegas, NV 89101

Re: August 26-30, 2019 Evidentiary Hearing in *Le v. Zuffa et al.*, Case No. 15-cv-01045

Dear Judge Boulware:

On behalf of non-party WME/IMG, LLC (“WME”), I write in response to Plaintiffs’ introduction of Exhibit PCCX41 (the “Exhibit”) at the August 28, 2019 evidentiary hearing in this matter. The Exhibit is a WME-produced document that contains highly sensitive trade secret and financial information. Upon review of the Exhibit, WME has identified parts that it seeks to redact. For the Court’s review, I have lodged the Exhibit under seal with redboxes indicating WME’s proposed redactions as a related exhibit.

The parties have agreed on some, but not all, of WME’s proposed redactions. Below, I list the portions of the Exhibit that Plaintiffs object to redacting and WME’s rationale for seeking its redactions; the remaining proposed redactions are uncontested.¹

Location of Proposed Redactions to PCCX41 to which Plaintiffs Object	WME’s Rationale for Redacting
Page 2	Sensitive financial and trade secret information.
Pages 5-6	Sensitive financial and trade secret information.
Pages 10-11	Sensitive financial information and trade secret information.
Page 18	Sensitive trade secret information.
Pages 20-26	Sensitive financial information and trade secret information.
Pages 30-32	Sensitive financial information and trade secret information.
Page 34	Sensitive financial information and trade secret information.
Page 38	Sensitive financial information.

¹ Plaintiffs do not object to WME’s proposed redactions to pages 9, 14-17, 27, 29, 33, 35-36, and 39.

As discussed at the hearing and in earlier briefing, *e.g.*, ECF Nos. 661-3, 709, compelling reasons exist to redact the above-listed information.

Sincerely,



Stacey K. Grigsby

*Attorney for Defendant Zuffa, LLC on behalf of non-party
WME/IMG, LLC.*